

THE HONORABLE JAMES L. ROBART

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICROSOFT CORPORATION,
Plaintiff,

vs.

MOTOROLA, INC., et al.,
Defendants.

MOTOROLA MOBILITY, INC., et al.,
Plaintiffs,

vs.

MICROSOFT CORPORATION,
Defendants.

Case No. C10-1823-JLR

**MICROSOFT'S MOTION FOR
LEAVE TO FILE MOTION TO
AMEND PROTECTIVE ORDER**

**NOTE ON MOTION CALENDAR:
Friday, September 7, 2012**

Pursuant to the Court's Minute Order dated August 24, 2012, Microsoft respectfully submits this request for leave to file a motion to amend the Protective Order issued in this action. As required by the Court's Minute Order, Microsoft's proposed Motion to Amend Protective Order to Allow Designated In-House Counsel Expanded Access to Confidential Business Information (with exhibits) (the "Motion to Amend") is attached hereto as Exhibit 1.

MICROSOFT'S MOTION FOR LEAVE TO FILE C10-1823
MOTION TO AMEND PROTECTIVE ORDER - 1

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1 Before Microsoft advised the Court of its interest in amending the Protective Order on
 2 August 23, counsel for the parties had discussed Microsoft's proposed amendment over the
 3 course of a two week period. When it became clear that no agreement would be reached,
 4 Microsoft promptly raised the issue with the Court, prior to the August 24 deadline for filing
 5 non-dispositive motions. Microsoft believes that its request is timely, and should be granted
 6 for the reasons set forth in its Motion to Amend.

7 DATED this 30th day of August, 2012.

8 CALFO HARRIGAN LEYH & EAKES LLP

9
 10 By /s/ Arthur W. Harrigan, Jr.
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Counsel for Microsoft Corp.

CERTIFICATE OF SERVICE

I, Linda Bledsoe, swear under penalty of perjury under the laws of the State of Washington to the following:

1. I am over the age of 21 and not a party to this action.
2. On the 30th day of August, 2012, I caused the preceding document to be served on counsel of record in the following manner:

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5 DATED this 30th day of August, 2012.

7 s/ Linda Bledsoe
LINDA BLEDSOE